

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDRE COLLIER

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

TRANE /AKA/ INGERSOLL RAND

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for Employment
Discrimination**

Case No. 16-5430 (PGS/TJB)

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ANDRE COLLIER
Street Address	34 Boudinot ST
City and County	TRENTON, NJ 0
State and Zip Code	NEW JERSEY 08618
Telephone Number	(609) 278-1551

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	JASON DE PEARLMAN
Job or Title (if known)	HUMAN RESOURCES
Street Address	2231 E STATE ST TRENTON
City and County	TRENTON, MERCER
State and Zip Code	NEW JERSEY 08619
Telephone Number	(609) 587-3756
E-mail Address (if known)	

Defendant No. 2

Name	Jimmy Edger
Job or Title (if known)	SUPERVISOR/MANAGER
Street Address	2231 E STATE ST
City and County	TRENTON / MERCER

State and Zip Code NEW JERSEY 08618
Telephone Number (609) 587-3756
E-mail Address _____
(if known) _____

Defendant No. 3

Name ANDREW /AKA/ Andy STEVENSON
Job or Title PLANT MANAGER
(if known) _____
Street Address 2231 E State ST
City and County TRENTON MERCER
State and Zip Code NEW JERSEY 08619
Telephone Number (609) 587-3756
E-mail Address _____
(if known) _____

Defendant No. 4

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name TRANE / Ingersoll Rand
Street Address 2231 E State ST
City and County TRENTON / MERCER
State and Zip Code NEW JERSEY 08619
Telephone Number (609) 587-3756

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Other federal law (specify the federal law):

SEXUAL ORIENTATION / Retaliation

- ☐ Relevant state law (specify, if known):

- ☐ Relevant city or county law (specify, if known):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts (specify): SEXUAL ORIENTATION

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

2009 TO PRESENT

C. I believe that defendant(s) (check one):

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

- ☒ race AFRO AMERICAN
- ☒ color BLACK
- ☒ gender/sex GAY BLACK MAN
- ☐ religion _____
- ☐ national origin _____
- ☐ age. My year of birth is _____. (Give your year of birth only if you are asserting a claim of age discrimination.)
- ☒ disability or perceived disability (specify disability)
BACK INJURY 2009-PRESENT

- E. The facts of my case are as follows. Attach additional pages if needed.

SEE ATTACHMENTS, I ANDRE COLLIER HAVE'S
been being HARASSED SINCE 2009 - PERSENT
& RETALIATED AGAINST FOR FILING A CLAIM IN 2009
I HAVE RECEIVED WRITE UPS WARNINGS
EVERYTHING SINCE 2009

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

FEB 2015

- B. The Equal Employment Opportunity Commission (check one):

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on (date)

JUNE 8 2016

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

☐

60 days or more have elapsed.

☒

less than 60 days have elapsed.

I ANDIE COLLIER is writing this
 GRIEVANCE Against (Sup) Jim + (group leader)
 Jimmy for Harassment + Discriminating
 behavior. Its been a while now that Ive
 notice how Jimmy follow + watches me to see
 what Im doing when the line is down

Today as I swept the area I noticed
 SEVERAL of my co-worker's doing nothing
 at one point Jimmy was in a conversation
 with one of them. While sweeping together
 my trash a coworker stop for a few words
 while picking up my trash Jimmy said to
 me check I need you to go an wipe the
 computers down I suggested that he get
 the people whom been standing around doing
 nothing. I had a similar incident with him
 on 5-14-14 I have witness to both

Im also been single out for use of the
 Rest room by (Sup) Jim. Ive notice how my
 co-workers don't report to use Restroom
 on 5-28-14 Jim takes me + Mustafa in break-
 room for not telling anyone my use of Restroom
 but I did I told Sheila. What was suppose
 to be a private conversation Jim told
 Sheila she was suppose to let someone know
 over

that I was in the restroom. He also told me that I need to bring in a note from my doctor because I use the restroom too much.

A few days ago when a co-worker left the line to go in the restroom without reporting it to anyone Jim sent another co-worker in to get her.

There were no words between her Jim and Mustafa in the breakroom concerning that.

Ancho Gil
5-29-14

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I returned to work on 2-17-16 I was out
under the care of Therapist + Psychiatrist
State of NJ say's I own them for that
time frame

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non-frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9-6 -, 2016

Signature of Plaintiff

Printed Name of Plaintiff

Andie Collier
ANDIE COLLIER

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____